



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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June 11, 2007

Ref: 8EPR-N

Lisa Murpurgo  
U.S. General Services Administration  
Rocky Mountain Region  
Denver Federal Center  
Service Center (8PD)  
P.O. Box 25546  
Building 41  
Denver Federal Center  
Denver, CO 80225-0546

Re: Master Site Plan and Draft Environmental Impact  
Study, CEQ # 20070169

Dear Ms. Murpurgo:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C Section 4231 et. seq., and Section 309 of the Clean Air Act 42 U.S.C Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Draft of the Denver Federal Center Master Site Plan Environmental Impact Study.

EPA applauds the efforts of the General Services Administration (GSA) to provide a "new vision and redevelopment strategy for the Federal Center." The mixed use elements of this site, which include residential, commercial space, the post office, St. Anthony's Hospital, open space, and the inter modal transit station will model sustainable future growth for this area. EPA's comments on this project focus mainly on air quality impacts in this corridor caused by increased traffic projections and infill growth.

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the action alternatives "EC-2" (Environmental Concerns-Insufficient Information). This "EC" rating means that impacts have been identified that should be avoided in order to fully protect the environment. The "2" rating means that additional information or data is needed to fully assess environmental impacts that should be avoided in order to fully protect the environment. An explanation of the rating criteria is enclosed. More specifically, this DEIS should assess the impacts from construction dust and equipment emissions on sensitive receptors such as St. Anthony Hospital on the west and Fletcher Miller School (school for special

needs population) on the east of the site. Four other schools surround this campus which should be considered in this assessment. They include Dennison Elementary, La Petite Academy, Glennon Heights Elementary, and Westland Christian Academy. If necessary, mitigation measures should be implemented during construction activity that is less than the 6 months in duration which was recommended in the DEIS.

Section 4.15 states that the air impacts related to proposed projects in the vicinity of the Federal Center project have been analyzed in-depth in several other documents that are referenced. EPA requests that the air quality analysis in these documents be summarized to allow us to fully evaluate the impact on air quality for this project. In addition, this section states that the potential local and regional air quality impact related to implementation of the Master Site Plan would be qualitatively similar to the impacts described in the other documents. This should also be summarized and elaborated upon.

This document does not evaluate future cumulative impacts on air quality associated with the project (e.g. Vehicle Miles Traveled increasing 4-5 times and need for road expansions around the entire perimeter of the site). In Section 4.15 it does indicate that the Fiscally Constrained 2030 Regional Transportation Plan (2030 RTP) demonstrates that the Denver region is in conformity. It is not clear whether this project is included in this 2030 RTP. If it is not included in the plan then the findings of the 2030 RTP have no bearing on this project. If this is the case, the cumulative air impacts for this project should be evaluated against the no action or “baseline” alternative.

We appreciate the opportunity to participate in this project. If you have any questions or would like to discuss our comments, please contact me (303) 312-6004 or Robin Coursen (303)312-6695 of my staff.

Sincerely,

/s/ Deborah Lebow  
for Larry Svoboda  
Director, NEPA Program  
Office of Ecosystems Protection and Remediation

Enclosure